

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON -AT SEATTLE

**USI INSURANCE SERVICES NATIONAL,
INC.**, formerly known as **WELLS FARGO
INSURANCE SERVICES USA, INC.**, a
North Carolina corporation,

Plaintiff,

vs.

LOCKTON COMPANIES, LLC, a Missouri
limited liability company; **LOCKTON
COMPANIES, LLC-PACIFIC SERIES**, a
Missouri limited liability company;
**NORTHEAST SERIES OF LOCKTON
COMPANIES, LLC**, a Missouri limited
liability company; and **SHIRLEY GORDON**,
an individual,

Defendants.

Case No. 2:17-cv-01842-JLR

**STIPULATED MOTION OF
DISMISSAL WITHOUT PREJUDICE
AND ~~PROPOSED~~ ORDER**

NOTING DATE: FEBRUARY 22, 2018

STIPULATION

All the undersigned parties hereby stipulate to dismissal of this action under Rule 41(a)(1). Defendants Northeast Series of Lockton Companies, LLC, and Shirley Gordon are also named as Defendants in a parallel action entitled *USI Insurance Services National, Inc. v. Northeast Series of Lockton Companies, LLC, et al.*, Case No. 8:17-cv-02895-VMC-TGW (M.D. Fla.) ("Florida Litigation"). The Defendants have agreed to submit to the jurisdiction of

STIPULATION OF DISMISSAL WITHOUT
PREJUDICE (17-01842) - Page 1

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1 the United States District Court for the Middle District of Florida in the Florida Litigation for
2 purposes of adjudicating Plaintiff's claims relating to Shirley Gordon's employment at, and
3 departure from, her prior employment at Wells Fargo Insurance Services USA, Inc. and
4 employment at Northeast. Plaintiff USI Insurance Services National, Inc. (formerly known as
5 Wells Fargo Insurance Services USA, Inc.), has also agreed to dismiss the above-captioned
6 action, in its entirety, without prejudice.

7 Dated: February 21, 2018

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9 /s Catharine M. Morisset

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18 *Attorneys for Plaintiff USI Insurance*
19 *Services National, Inc.*

/s Todd Williams (per email authority)

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Attorneys for Defendants Lockton Companies,
LLC; Northeast Series of Lockton Companies,
LLC; and Lorraine Yumul Gant

17 **ORDER**

18 Based on the foregoing Stipulation, it is hereby ORDERED that this action is dismissed
19 without prejudice.

20 Entered this 22nd day of February, 2018.

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THE HONORABLE JAMES ROBART

CERTIFICATE OF SERVICE

I hereby certify that on the date below written, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and caused to be served a true and correct copy of same by the method indicated below and addressed as follows:

Steven W. Fogg, WSBA #23528
Todd T. Williams, WSBA #45032
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Attorneys for Defendants

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 22, 2018, in accordance with 28 USC 1746.



Jazmine Matautia

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PREJUDICE (17-01842) - Page 3

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